

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

ATLAS DATA PRIVACY
CORPORATION, *et al.*,

Plaintiffs,

v.

BELLES CAMP COMMUNICATIONS,
INC., *et al.*,

Defendants.

Case No. 1:24-cv-04949

ATLAS DATA PRIVACY
CORPORATION, *et al.*,

Plaintiffs,

v.

DELVEPOINT, LLC, *et al.*,

Defendants.

Case No. 1:24-cv-04096

ATLAS DATA PRIVACY
CORPORATION, *et al.*,

Plaintiffs,

v.

EQUIMINE, INC., *et al.*,

Defendants.

Case No. 1:24-cv-04261

ATLAS DATA PRIVACY
CORPORATION, *et al.*,

Case No. 1:25-cv-01480

Plaintiffs, v. FIRST DIRECT, INC., <i>et al.</i> , Defendants.
ATLAS DATA PRIVACY CORPORATION, <i>et al.</i> , Plaintiffs, v. GOHUNT, LLC, GOHUNT MANAGEMENT HOLDINGS, LLC, <i>et al.</i> , Defendants.
ATLAS DATA PRIVACY CORPORATION, <i>et al.</i> , Plaintiffs, v. INFOMATICS, LLC, <i>et al.</i> , Defendants.
ATLAS DATA PRIVACY CORPORATION, <i>et al.</i> , Plaintiffs, v.

Case No. 1:24-cv-04380

Case No. 1:24-cv-04041

Case No. 1:25-cv-01535

INNOVATIVE WEB SOLUTIONS, LLC,
et al.,

Defendants.

ATLAS DATA PRIVACY
CORPORATION, *et al.*,

Plaintiffs,

v.

LIGHTHOUSE LIST COMPANY, LLC, *et al.*,

Defendants.

Case No. 1:24-cv-11443

ATLAS DATA PRIVACY
CORPORATION, *et al.*,

Plaintiffs,

v.

MELISSA DATA CORPORATION, *et al.*,

Defendants.

Case No. 1:24-cv-04292

ATLAS DATA PRIVACY
CORPORATION, *et al.*,

Plaintiffs,

v.

NUWBER, INC., *et al.*,

Defendants.

Case No. 1:24-cv-04609

ATLAS DATA PRIVACY
CORPORATION, *et al.*,

Plaintiffs,

v.

PEOPLEWHIZ, INC., *et al.*,

Defendants.

Case No. 1:25-cv-00237

ATLAS DATA PRIVACY
CORPORATION, *et al.*,

Plaintiffs,

v.

THE PEOPLE SEARCHERS, LLC, *et al.*,

Defendants.

Case No. 1:24-cv-04045

ATLAS DATA PRIVACY
CORPORATION, *et al.*,

Plaintiffs,

v.

WE INFORM, LLC, *et al.*,

Defendants.

Case No. 1:24-cv-04037

ATLAS DATA PRIVACY
CORPORATION, *et al.*,

Plaintiffs,

v.

Case No. 1:24-cv-04098

QUANTARIUM ALLIANCE, LLC, <i>et al.</i> , Defendants.	
ATLAS DATA PRIVACY CORPORATION, <i>et al.</i> , Plaintiffs, v. SPY DIALER, INC., <i>et al.</i> , Defendants.	Case No. 1:24-cv-11023
ATLAS DATA PRIVACY CORPORATION, <i>et al.</i> , Plaintiffs, v. GREENFLIGHT VENTURE CORPORATION, <i>et al.</i> , Defendants.	Case No. 1:25-cv-01517

DECLARATION OF RAJIV D. PARIKH

I, Rajiv D. Parikh, Esquire, being of full age, do hereby declare under penalty of perjury pursuant to 28 U.S.C. § 1746, that the following is true and correct:

1. I am counsel for Plaintiffs in the above captioned matters.
2. On April 2, 2025, the Court ordered Plaintiffs to serve “any interrogatories and requests for production of documents relevant to the motions of

defendants to dismiss pursuant to Rule 12(b)(2) of the Federal Rules of Civil Procedure.” Doc. 50 at 10.

3. On April 14, 2025, Plaintiffs served their First Set of Interrogatories and Request for Production of Documents, upon Defendants, other than First Direct, Inc., exemplars of which are attached to this Declaration as Exhibit A.

4. On May 14, 2025, these Defendants served Responses and Objections to Plaintiffs discovery requests.

5. On May 20, 2025, Plaintiffs served their First Set of Interrogatories and Request for Production of Documents, upon Defendant First Direct, Inc.

6. Defendants’ production in response to Plaintiffs’ discovery requests was deficient, with three of these Defendants producing no documents to date.

7. On June 4, 2025, Plaintiffs’ counsel sent Defendants’ counsel deficiency letters, an exemplar of which is attached to this Declaration as Exhibit B.

8. On June 9, 2025, the parties met and conferred to resolve these disputes over discovery but remained at an impasse.

9. On June 16, 2025, the Court held a status conference and subsequently ordered Plaintiffs to file a motion to compel Defendants “to respond to interrogatories and requests for production of documents related to the issue of personal jurisdiction.” Doc. 63, 64.

I declare under penalty of perjury, pursuant to 28 U.S.C. § 1746, this first day of July 2025, in West Orange, New Jersey, that the foregoing statements are true and correct.

Respectfully submitted,

Dated: July 1, 2025

By: /s/ Rajiv D. Parikh

Rajiv D. Parikh

PEM LAW LLP

Rajiv D. Parikh

1 Boland Dr., Suite 101

West Orange, New Jersey 07052

Telephone: (973) 557-5700

Email: rparikh@pemlawfirm.com

Counsel for Plaintiffs